

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

PROFANT, INC. DBA BUSINESS)
NETWORK TEAM) Case No.: 1:16-cv-00753
2 Berea Commons, Suite 205)
Berea, Ohio 44017,)
)
Plaintiff,) Judge: Dan A. Polster
vs.)
)
MICHAEL WITKOWSKI) Magistrate: William H. Baughman, Jr.
111 Riveredge Parkway)
Berea, Ohio 44017)
)
and)
)
U.S. NETWORK, INC.) DEFENDANT U.S. NETWORK, INC.'S
3554 Brecksville Road, Suite 200) MOTION REGARDING SETTLEMENT
Richfield, Ohio 44286,) CONFERENCE REPRESENTATIVE
)
Defendants.)

Defendant U.S. Network, Inc. (“USN”), by counsel, respectfully moves the Court for permission for USN’s Chief Technology Officer, Mark A. Venuto, to attend the upcoming settlement conference as the representative of USN. In support of this Motion, USN shows the Court as follows:

1. On March 30, 2016, the Court held a teleconference with counsel in this matter. At that conference, the Court scheduled an in-person settlement conference beginning at 1 p.m. on Wednesday, April 13, 2016. (Minute Entry, 3/30/2016).
2. The Court instructed the parties that the following individuals are to attend the settlement conference: lead counsel for all parties, the CEOs of Plaintiff and USN, and Defendant Witkowski. (*Id.*).

3. Counsel for USN has conferred with USN's CEO who has indicated that USN's Chief Technology Officer is better positioned to address both the claims at issue in this case, including several computer-related claims, and the potential settlement of the matter.

4. In this regard, USN's Chief Technology Officer, Mark A. Venuto, is himself a significant shareholder of USN and will possess full settlement authority at the judicial settlement conference on April 13th.

WHEREFORE, USN respectfully requests that Mr. Venuto be permitted to attend the settlement conference in lieu of USN's CEO, on the condition that Mr. Venuto possess full settlement authority, and for all other relief just and proper in the circumstances.

Respectfully Submitted,

s/ Jason T. Clagg

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ATTORNEY FOR U.S. NETWORK, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 4th day of April 2016, by electronically filing the same with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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